

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES,**  
**Plaintiff,**

**-v-**

**Case No. 2-18-CR-147  
Judge Graham**

**BILAL A. EL YOUSSEPH,**  
**Defendant.**

**DEFENSE COUNSEL'S MOTION TO WITHDRAW  
AND FOR APPOINTMENT OF COUNSEL UNDER  
CRIMINAL JUSTICE ACT**

Undersigned counsel respectfully requests that the Court issue an order terminating him as counsel of record for Defendant, Bilal A. El Yousseph, and appointing new counsel under the Criminal Justice Act to handle his case in the district court, for the reasons set forth in the accompanying memorandum.

s/Joseph R. Landusky

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Joseph R. Landusky (0038073)  
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(614) 449-0449  
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Attorney for Bilal A. El Yousseph

**MEMORANDUM**

Counsel was retained by Mr. El Yousseph to defend him concerning the charges in the instant action. At that time, Mr. El-Yousseph provided counsel with a portion of the agreed

retainer. That partial retainer has been exhausted. Mr. El Yousseph is not able to pay any further on the retainer agreed upon by the parties. Mr. El Yousseph is now indigent and has filed an affidavit of indigency (Doc.9). It is respectfully requested that the Court issue an Order terminating Joseph R. Landusky as counsel of record for Defendant, Bilal El Yousseph, and appoint counsel under the Criminal Justice Act to handle his case in the district court on his behalf.

Respectfully submitted,

s/Joseph R. Landusky

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Attorney for Bilal El

**CERTIFICATE OF SERVICE**

This motion was served on opposing counsel using the Court's CM/ECF system this 22nd day of August 2018; Defendant Bilal El Yousseph was served by regular U.S. mail service, postage pre-paid this 22<sup>nd</sup> day of August 2018 to FCCII, 2460 Jackson Pike, Columbus, Ohio 43223.

s/Joseph R. Landusky

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Joseph R. Landusky